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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9 **WESTERN DIVISION**

10 CENTER FOR BIOLOGICAL
11 DIVERSITY, et al.,

12 *Plaintiffs,*

13 v.

14 DOUG BURGUM, et al.,

15 *Defendants,*

16 SABLE OFFSHORE CORP.,

17 *Intervenor-Defendant.*
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Case No. 2:24-cv-05459-MWC-MAA

DECLARATION OF
TEVIN SCHMITT

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22 I, Tevin Schmitt, hereby declare as follows,

23 1. I have personal knowledge of the statements in this declaration and, if
24 called as a witness, I could and would competently testify to these matters under
25 oath. Statements expressing an opinion reflect my own personal view and
26 judgment on the matter.
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1 2. I have been a member of the Wishtoyo Foundation since the summer
2 of 2014, after I took an environmental law and policy course taught by Wishtoyo's
3 previous senior counsel, Jason Weiner, at California State University Channel
4 Islands ("CSU Channel Islands"). I became a member of the Wishtoyo Foundation
5 because I whole-heartedly believe in the organization's mission, the visionary
6 passion of Mati Waiya, Wishtoyo's dedication to protecting cultural keystone
7 species and their habitats, and the centering of traditional ecological knowledge in
8 their environmental advocacy. Wishtoyo's mission is to protect and preserve
9 Chumash culture, the culture of all indigenous peoples, and the natural resources
10 upon which all people depend.

11 3. I am also the Watershed Scientist for the Wishtoyo Chumash
12 Foundation. I have held this position since January 2019. As Watershed Scientist,
13 my responsibilities include managing the organization's watershed monitoring
14 program, our paid internship program, providing expert support for our
15 environmental litigation, managing our lab space for wet chemistry at CSU
16 Channel Islands, managing our environmental justice advocacy campaigns, and
17 providing assistance for our cultural and environmental education programs.

18 4. I graduated from CSU Channel Islands with a Bachelor of Science in
19 environmental science and resource management in 2016. This program included a
20 rigorous senior capstone project that includes two semesters of courses, data
21 collection and analysis, presentation at a research conference on campus, and a
22 final thesis. For this academic undertaking, I studied invertebrate population
23 ecology of the sandy beaches of Southern California. My capstone included data
24 collection of 31 sandy beaches from Zuma Beach in LA County to Gaviota State
25 Beach in Santa Barbara County. My data collection and thesis included the analysis
26 of invertebrate infauna populations of El Capitan and Refugio State Beaches. I was
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1 collecting data for my capstone project at the time of the 2015 oil spill at Refugio
2 State Beach. I was at El Capitan State Beach, about 3 miles down coast from the
3 spill location, when oil started to wash up on the beach. I will never forget the
4 immense pain and anger I felt watching the ecosystems I am most passionate about
5 covered with crude oil. The memory of the smell, while I witnessed the beach turn
6 black with oil, still haunts me.

7 5. During this time, I was also invited to take part in the California State
8 University system's interdisciplinary research course and symposium, culminating
9 in the publication of my research and a presentation of my research at a
10 conference. Shortly following the 2015 oil spill, I continued to work as a research
11 assistant in Dr. Sean Anderson's Pacific Institute for Restoration Ecology (PIRatE)
12 lab for the summer. I collected hundreds of berried pacific mole crab (*Emerita*
13 *analoga*) specimens to conduct ecotoxicology research connected to the oil spill.
14 My research found that the oil from the 2015 spill caused significant
15 developmental impacts and delays for pacific mole crab larval development. This
16 species is the primary food source for migratory shorebirds that rely on the
17 California coast for food along their migration to arctic breeding habitats.

18 6. Since my time at CSU Channel Islands, I have been an avid birder. I
19 am a member of the Ventura Audubon Society and regularly volunteer for their
20 events and lead educational hikes to teach the public about local ecology and bird
21 identification. One of my favorite hobbies is going to beaches, wetlands, nature
22 preserves, parks, and forests to watch, photograph, and appreciate birds. I feel a
23 deep connection with all wildlife, but birds are incredibly fascinating to me. I am
24 enthralled by the evolution of flight, the mastery of terrestrial and marine
25 ecological niches, and their song. It is estimated that the 2015 oil spill killed at
26 least 558 birds. This is just from the direct oiling of sea birds and does not include
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1 the indirect and long-lasting ecological impacts of an oil spill. Impacts to
2 reproduction success of invertebrates like the pacific mole crab and hundreds of
3 marine fish species undoubtedly caused severe impacts to the entire food web of
4 the near shore and coastal environments of southern California.

5 7. I am planning on continuing to lead field trips for the Ventura
6 Audubon Society and will likely be leading a hike this upcoming fall at Emma
7 Wood State Beach, Ormond Beach/Wetlands, or the Santa Clara River
8 Estuary/McGrath State Beach. All of these beaches were impacted by the 2015 oil
9 spill, and I am concerned that the restart of oil transportation and the operations of
10 the Santa Ynez Unit may cause another spill that will impact these areas. As
11 Watershed Scientist for the Wishtoyo Foundation, I collect water quality data
12 nearly monthly from the Santa Clara River Estuary and train our interns on bird
13 identification, estuarine ecology, and sandy beach ecology. Any future threats to
14 the Santa Clara River estuary would have a significant impact on my enjoyment of
15 this sensitive habitat, and my ability to perform my duties as Watershed Scientist. I
16 also host Wishtoyo's efforts in supporting the Snapshot Calcoast program, a
17 statewide initiative to collect biodiversity data along California's coastline.
18 Wishtoyo hosts one to two "bio blitzes" to support this program in the early
19 summer of every year at locations like the Wishtoyo Chumash Village/Nicholas
20 Canyon Beach, Santa Clara River Estuary, Goleta Beach, or Coal Oil Point. These
21 "bio blitzes" involve volunteers, members, and Wishtoyo staff using the iNaturalist
22 application to collect biodiversity data at various beaches and coastal ecosystems
23 in the Chumash homelands. These events are fun for all ages and individuals with
24 an interest in biological diversity and natural cultural resources. All of the beaches
25 where Wishtoyo has hosted bio blitzes for Snapshot Calcoast experienced oiling
26 from the 2015 spill, and I am concerned that the heightened risk of a future spill if
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1 restart moves forward with proper review threatens these sensitive and ecologically
2 significant beaches.

3 8. I live on a property in the mountains above Carpinteria, CA with a
4 view of the ocean and Santa Barbara Channel. My partner and I regularly take
5 walks with our dog at Carpinteria Bluffs to observe birds and the harbor seal
6 rookery at this park. We will continue to use these publicly available trails for
7 wildlife and scenery viewing, and the increased risk of an oil spill from the restart
8 of the Santa Ynez Unit operations threatens our continued enjoyment of this public
9 resource.

10 9. I am concerned that the Bureau of Safety and environmental
11 Enforcement (BSEE) avoided necessary environmental review with the use of
12 arbitrary categorical exclusions, rubber stamping the lease extensions and permits
13 for decrepit oil and gas facilities that threaten our coastal and marine environments.
14 In my opinion, actions like this betray public trust in federal agencies and threaten
15 public safety. One of my responsibilities as Wishtoyo's Watershed Scientist is to
16 understand the risks of restarting oil extraction and operations of the Santa Ynez
17 Unit. I am appalled that there were no environmental review or mitigation
18 measures considered for the sensitive environmental and cultural resources of the
19 region, including the newly designated Chumash Heritage National Marine
20 Sanctuary and the marine protected areas around the Channel Islands. I believe that
21 it is BSEE's responsibility to conduct a full analysis on potential impacts of the
22 restart of oil production from three aging oil rigs that use old offshore and onshore
23 pipeline systems, and other facilities associated with the Santa Ynez Unit. This
24 analysis of impacts should also include the increased risk of an oil spill and related
25 environmental impacts. I believe that these approvals increase the probability of
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1 another oil spill, either along the Gaviota Coast, or within one of the coastal
2 watersheds that support sensitive species and their habitats.

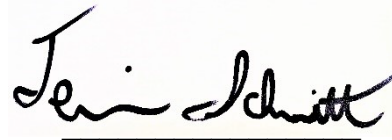
3 10. BSEE's actions will extend the life of the increasingly aged and
4 decrepit oil infrastructure in incredibly sensitive marine and coastal habitats. The
5 prolonged oil development and drilling in the Santa Ynez Unit increases
6 greenhouse gas emissions, causes adverse impacts to the unique landscape of the
7 Santa Barbara coast, and threatens sensitive coastal wetlands, salt marshes, near
8 shore marine environments, and sandy beaches of southern California. The restart
9 of oil production and transportation through the offshore and onshore pipelines
10 connected to the Santa Ynez Unit threatens our communities, my enjoyment of our
11 beaches, my bird watching hobbies, volunteer events, and my psychological
12 wellbeing.

13 11. A decision that supports the plaintiffs in this case would help protect
14 my interests, passions, volunteer efforts, my ability to conduct my responsibilities
15 as Watershed Scientist, and hobbies. Relief from the court would ensure that
16 agencies properly review and mitigate impacts from future projects and secure the
17 public's right to provide input on these agency actions.

18 12. Taking action to mitigate or halt the harms to southern California's
19 sensitive coastline and Pacific Ocean caused by the lack of proper environmental
20 review will reduce the impacts that the operations of the Santa Ynez Unit have on
21 my personal and professional interests and passions.

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23 I declare under penalty of perjury that the foregoing is true and correct.
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Executed on May 1, 2025

A handwritten signature in black ink, reading "Tevin Schmitt", is displayed on a light yellow rectangular background. The signature is written in a cursive style with a horizontal line underneath the name.

Tevin Schmitt